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BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

In the Matter of	)
	)
FIXED POINT-TO-POINT COMMUNICATIONS SECTION, WIRELESS COMMUNICATIONS DIVISION, TELECOMMUNICATIONS INDUSTRY ASSOCIATION	)
	)
Petition for Rulemaking for Amendment of the Commission's Rules to Facilitate Fixed Point-to-Point Terrestrial Microwave Radio Service Licensee Use of the 23 GHz and 10 GHz Bands and to Eliminate Certain Inconsistencies in Such Rules	)

RM 9418

COMMENTS OF AIRTOUCH COMMUNICATIONS, INC.

AirTouch Communications, Inc. ("AirTouch") hereby supports the above-captioned Petition for Rulemaking and submits brief comments on the proposal to modify the existing antenna standards to allow 2-foot diameter antennas in the 10 GHz band.[1]

In its Petition for Rulemaking, the Fixed Point-to-Point Communications Section, Wireless Communications Division, Telecommunications Industry Association ("TIA Fixed Section") urges the Commission to amend Parts 25, 74, 78, 90 and 101 of its rules to facilitate the ability of licensees in the fixed point-to-point terrestrial microwave radio services ("Fixed Services") to use the 10 GHz and 23 GHz band. Of particular interest to AirTouch, TIA Fixed Section urges the Commission to modify the existing antenna standards to allow 2-foot diameter high performance antennas under the Category A standard and 4-foot diameter antennas under

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[1] *See* "Office of Public Affairs Reference Operations Division Petitions for Rulemaking Filed," Report No. 2309 (rel. February 5, 1999).

the Category B standard in the 10 GHz band.[2] According to TIA Fixed Section, existing antenna size restrictions deter Fixed Services use of the 10 GHz band and if "antenna standards are changed to permit smaller antennas . . ., studies indicate that this band will be more attractive for paths longer than 2.3 miles."[3]

AirTouch uses Fixed Services in the 10 GHz band for microwave support and backhaul purposes and thus has particular experience and interest in promoting reliable and efficient microwave operations. AirTouch concurs with TIA Fixed Section that a rulemaking is necessary and urges the Commission to move quickly to develop a record upon which it may revise its antenna standards to permit smaller antennas in the 10 GHz band.

The Commission established the current antenna restrictions in the 10 GHz band to promote spectrum efficiency.[4] As discussed below, however, AirTouch believes that the benefits of permitting 2-foot antennas are significant and that the TIA Fixed Section's proposal strikes a fair balance between efficient use of the spectrum and flexibility to accommodate the real world problems of deploying antennas.

Local homeowner associations and zoning boards are increasingly involved in regulating the appearance of microwave facilities in their neighborhoods. Indeed, many zoning boards have been hostile to AirTouch's requests for approval for 4-foot antennas and delay approval of applications involving these larger antennas. Such delay can be a serious impedi-

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2 Petition at 23-25.

3 *Id.* at 24.

4 *Reorganization and Revision of Parts 1, 2, 21, and 94 of the Rules to Establish a New Part 101 Governing Terrestrial Microwave Fixed Radio Services,* 11 FCC Rcd 13449, 13474-75 (1996).

ment to AirTouch's deployment plans, thereby delaying the benefits of expanded cellular services to the public.

Allowing use of smaller antennas at 10 GHz will also provide an important alternative to the 18 GHz band. As the Commission is well aware, the amount of spectrum available for traditional point-to-point services continues to decrease as additional mobile and satellite services are deployed in bands designated for microwave use. Indeed, the Commission recently proposed a band segmentation plan for 18 GHz that will significantly reduce the amount of spectrum available for point-to-point services in that band.[5] Given the reduced spectrum at 18 GHz, it is important that the Commission provide carriers the flexibility necessary to use the 10 GHz band as a substitute when necessary.

Further, AirTouch is rapidly developing microcells and deploying expanded services and it plans to use microwave to interconnect cell sites. Small 2-foot antennas in the 10 GHz band would be satisfactory for such purposes and would provide sufficient path reliability, while maintaining low visual profile to satisfy local interests. In addition, 2-foot antennas would resolve loading issues on towers. The smaller antennas would permit AirTouch to place more antennas upon a given tower. Again, this is a much more efficient use of resources and should be endorsed by the Commission.

Accordingly, AirTouch supports TIA Fixed Section's request that the Commission institute a rulemaking to facilitate the ability of licensees in the Fixed Services to use the 10

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5 *Redesignation of the 17.7-19.7 GHz Frequency Band, Blanket Licensing of Satellite Earth Stations in the 17.7-20.2 GHz and 27.5-30.0 GHz Frequency Bands, and the Allocation of Additional Spectrum in the 17.3-17.8 GHz and 24.75-25.25 GHz Frequency Bands for Broadcast Satellite Service Use*, 13 FCC Rcd 199923 (rel. Sept. 18, 1998).

GHz and 23 GHz band. In particular, AirTouch urges the Commission to move quickly to revise the antenna standards to permit smaller antennas in the 10 GHz band.

Respectfully submitted,

AIRTOUCH COMMUNICATIONS, INC.

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Date: March 8, 1999

CERTIFICATE OF SERVICE

I, Shelia L. Smith, hereby certify that I have on this 8th day of March, 1999 caused a copy of the foregoing Comments of AirTouch Communications, Inc. to be served by first class U.S. mail, postage prepaid, to the following:

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